

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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TODD KREISLER,

Plaintiff,

**Civil Action No.: 12 Civ. 4052 (PAE)
ECF CASE**

-v-

ANSWER TO COUNTER-CLAIMS

KAIS ABID d/b/a PAPA JOHN'S,
PARKER EAST 24th APARTMENTS, LLC,
a New York limited liability company,
KAM FOUR, INC., a New York corporation,
d/b/a PAPA JOHN'S, PARKER 24
COMMERCIAL ASSOCIATES, a New York
limited partnership, and 305 EAST 24TH OWNERS
CORP., a New York corporation,

Defendants.

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Plaintiff, TODD KREISLER, by and through his counsel, hereby answers Kais Abid's and Kam Four, Inc.'s (hereinafter referred to as "defendants") counter-claims [Dkt. 83] as follows:

1. Deny's each and every allegation contained in Paragraph No. 59 of the defendants' counter-claim.
2. Deny's each and every allegation contained in Paragraph No. 60 of the defendants' counter-claim.
3. Deny's each and every allegation contained in Paragraph No. 61 of the defendants' counter-claim.

WHEREFORE, having fully answered the allegations contained in the Counter-Claims, the Plaintiff request entry of judgment in its favor along with an award of reasonable fees and costs, and such other and further relief as this Court deems just and proper.

Dated: April 1, 2013
New York, New York

Respectfully submitted,

/s/ Adam Shore

Adam T. Shore, Esq.

Law Offices of Adam Shore, PLLC

Attorney for Plaintiff

100 Park Avenue, Suite 1600

New York, New York 10017

Telephone: (646) 476-4296

Facsimile: (646) 390-7422

Email: atsesq@gmail.com